IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

HOTEL 57 L.L.C.,

Plaintiff,

Case No. 22-cv-2554

v.

INTEGRAL CONTRACTING INC.,

Defendant.

INTEGRAL CONTRACTING INC.,

Counter-Plaintiff,

v.

HOTEL 57 L.L.C.,

Counter-Defendant.

INTEGRAL CONTRACTING INC.,

Third-Party Plaintiff,

v.

PARAMOUNT PAINTING GROUP, LLC; AND JOLIE PAPIER LTD,

Third-Party Defendants.

Hon. Paul A. Engelmayer

[PROPOSED] AGREED RULE 502(d) ORDER

This matter coming to be heard, the Court hereby being advised that the parties have agreed as follows, IT IS HEREBY ORDERED THAT:

1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This

Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

SO ORDERED.

PAUL A. ENGELMAYER

United States District Judge

Dated: July 0, 2022

New York, New York